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 and Non-Party Witnesses Jodi Sutton, Ann Laporte  
 and Ray Martinelli*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

In re JUNIPER NETWORKS, INC.  
 SECURITIES LITIGATION

CASE NO.: C06-04327-JW

**STIPULATION AND  
~~PROPOSED~~ ORDER  
 SHORTENING TIME FOR  
 HEARING THE MOTION FOR  
 PROTECTIVE ORDER  
 REGARDING DEPOSITIONS**

This Document Relates To:

ALL ACTIONS

THE NEW YORK CITY EMPLOYEES'  
 RETIREMENT SYSTEM, THE  
 TEACHERS' RETIREMENT SYSTEM OF  
 THE CITY OF NEW YORK, THE NEW  
 YORK CITY FIRE DEPARTMENT  
 PENSION FUND, THE NEW YORK CITY  
 POLICE PENSION FUND, THE NEW  
 YORK CITY POLICE SUPERIOR  
 OFFICERS' VARIABLE SUPPLEMENTS  
 FUND, THE NEW YORK CITY POLICE  
 OFFICERS' VARIABLE SUPPLEMENTS  
 FUND, THE NEW YORK CITY  
 FIREFIGHTERS' VARIABLE  
 SUPPLEMENTS FUND, AND THE NEW  
 YORK CITY FIRE OFFICERS' VARIABLE  
 SUPPLEMENTS FUND, AND THE NEW  
 YORK CITY TEACHERS' RETIREMENT  
 SYSTEM OF THE CITY OF NEW YORK

CASE NO.: CV-08-0246-JW

STIP. AND [PROPOSED] ORDER SHORTENING  
 TIME ON MOT. FOR PROTECTIVE ORDER  
 CASE No. C06-04327-JW (PVT) AND  
 CASE No. CV-08-0246-JW (PVT)

1 VARIABLE ANNUITY PROGRAM, )  
2 Plaintiffs, )  
3 v. )  
4 LISA C. BERRY, )  
5 Defendant. )  
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1 WHEREAS, concurrently with filing this Stipulation, defendant Juniper Networks,  
2 Inc. and non-parties Jodi Sutton, Ann Laporte and Ray Martinelli will file a Motion for  
3 Protective Order Regarding Depositions (“Motion for Protective Order”);

4 WHEREAS, the issue raised in the Motion for Protective Order is discrete and the  
5 parties would like to have it heard on the same date as the previously-scheduled hearing on  
6 Lead Plaintiffs’ pending Motion to Compel Juniper Networks, Inc. to Produce Restatement  
7 Communications (Dkt. No. 280 in Case No. 06-04327);

8 WHEREAS, in addition, the Motion for Protective Order concerns certain depositions  
9 that the lead plaintiffs plan to take in August, and the parties need a decision on the Motion  
10 for Protective Order sooner than the standard 35-day notice so they can adequately plan in  
11 advance of the planned depositions;

12 NOW THEREFORE, the parties stipulate, and request that the Court order:

- 13 1. Any opposition(s) to the Motion for Protective Order shall be filed by July 22,  
14 2009;
- 15 2. Any reply in support of the Motion for Protective Order shall be filed by July  
16 28, 2009;
- 17 3. A hearing on the Motion for Protective Order shall be held on August 4, 2009  
18 at 10:00 a.m.

19 IT IS SO STIPULATED.

20 DATED: July 13, 2009

21 WILSON SONSINI GOODRICH & ROSATI, P.C.  
22 NINA F. LOCKER  
23 STEVEN GUGGENHEIM  
24 JONI OSTLER

25 /s/ Joni Ostler

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*Counsel for Defendant Juniper Networks, Inc., and  
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and Ray Martinelli*

1 DATED: July 13, 2009

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*Lead Counsel for Lead Plaintiff*

8 DATED July 13, 2009

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16 DATED July 13, 2009

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*Counsel for Defendant Lisa C. Berry*

\* \* \*

25 IT IS SO ORDERED.

26 Dated: 7/15/09

  
\_\_\_\_\_  
The Honorable PATRICIA V.  
TRUMBULL